

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>RAKIAM SAVAGE RONALD BYRD HANEEF PALMER MALIK PALMER</b>	<b>:</b>	<b>VIOLATIONS: 18 U.S.C. § 371 (conspiracy to commit offenses against the United States – 1 count) 18 U.S.C. § 1951 (robbery which interferes with interstate commerce – 1 count) 18 U.S.C. § 659 (theft from interstate shipment – 2 counts) 18 U.S.C. § 641 (theft of government money – 1 count) 18 U.S.C. § 659 (possession of items from interstate shipment theft – 1 count) 18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least as early as on or about March 1, 2023, through in or around July 2023, defendants

**RAKIAM SAVAGE,  
RONALD BYRD,  
HANEEF PALMER, and  
MALIK PALMER**

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to commit theft from interstate shipments of freight or other property, and to possess stolen goods from interstate shipments of freight or other property, in violation of Title 18, United States Code, Section 659; and to commit theft of government

money, and to receive and retain stolen government money, in violation of Title 18, United States Code, Section 641.

### **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendants RAKIEM SAVAGE, HANEEF PALMER, and MALIK PALMER, together and with others known and unknown to the grand jury, stole goods moving as part of interstate shipments located on trailers in Philadelphia.

3. Defendants RAKIEM SAVAGE, RONALD BYRD, HANEEF PALMER, and MALIK PALMER offered to sell stolen goods, including, but not limited to, televisions, frozen crab legs, frozen shrimp, frozen meat, beer, and liquor, to people in Philadelphia.

4. Beginning in or about March 2023, defendants RAKIEM SAVAGE, RONALD BYRD, HANEEF PALMER, and MALIK PALMER used a white box truck bearing Pennsylvania license plate ZVT-6600 to transport and store stolen goods.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about March 11, 2023, defendant RONALD BYRD acquired control of a white box truck bearing Pennsylvania license plate ZVT-6600.

2. On or about March 12, 2023, defendant RONALD BYRD sent defendant RAKIEM SAVAGE a message informing SAVAGE that he had acquired the white box truck bearing Pennsylvania license plate ZVT-6600.

3. On or about March 17, 2023, defendant RAKIEM SAVAGE stole 60 cases of Jose Cuervo tequila from a trailer in Philadelphia.

4. On or about April 1, 2023, defendants RAKIEM SAVAGE, HANEEF PALMER, and MALIK PALMER stole six Continental Refrigerators from a tractor trailer in Philadelphia using the white box truck bearing Pennsylvania license plate ZVT-6600.

5. On or about April 9, 2023, defendant RONALD BYRD sent messages to numerous people indicating that he had frozen shrimp for sale.

6. On or about April 10, 2023, defendant RONALD BYRD sent messages to numerous people that he had 75-inch Samsung televisions for sale.

7. On or about April 13, 2023, defendants RAKIEM SAVAGE, HANEEF PALMER, and MALIK PALMER stole approximately \$234,474.80 worth of United States dimes from a tractor trailer in Philadelphia.

8. On or about April 14, 2023, defendant MALIK PALMER sent RONALD BYRD a link to an online “Money Weight Calculator” that can calculate how much a certain amount of money would weigh in different dollar bill or coin denominations, e.g., the weight of a certain amount of United States dimes. BYRD then sent the “Money Weight Calculator” to defendants RAKIEM SAVAGE and HANEEF PALMER.

9. On or about May 7, 2023, at the direction of defendant RONALD BYRD, Person #1, a person known to the grand jury, exchanged thousands of dollars’ worth of United States dimes at Coinstar machines located in Cockeysville and Towson, Maryland. Person #1 then sent BYRD text messages of the receipts of the dime exchanges.

10. On or about May 9, 2023, defendant RAKIEM SAVAGE possessed at his home dozens of cases of Malibu rum stolen from an interstate shipment.

11. On or about May 10, 2023, defendant MALIK PALMER deposited more than \$1,400 worth of dimes at a Citadel Credit Union branch in Harleysville, Pennsylvania, and withdrew \$1,200 in cash. That same day, MALIK PALMER deposited over \$1,500 worth of dimes at a Citadel Credit Union branch in Lansdale, Pennsylvania, and withdrew \$1,500 in cash.

12. On or about May 11, 2023, defendant MALIK PALMER deposited over \$1,100 worth of dimes at a Citadel Credit Union branch in Montgomeryville, Pennsylvania, and withdrew \$1,000 in cash. That same day, MALIK PALMER deposited over \$1,200 worth of dimes at a Citadel Credit Union branch in Springfield, Pennsylvania, and withdrew \$1,200 in cash.

13. On or about July 18, 2023, RAKIEM SAVAGE, RONALD BYRD, HANEEF PALMER, and MALIK PALMER possessed hundreds of dimes stolen on April 13, 2023 in the white box truck bearing Pennsylvania license plate ZVT-6600.

All in violation of Title 18, United States Code, Section 371.



**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. National Refrigeration & A/C at 450 Winks Lane, Bensalem, PA 19020 was a business engaged in and affecting interstate commerce, by producing and distributing goods in and between Pennsylvania and other states.

2. Catashov Inc. at 535 Philmont Avenue in Feasterville, PA 19053 was a business engaged in and affecting interstate commerce, by transporting goods between Pennsylvania and other states.

3. On or about April 1, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
HANEEF PALMER, and  
MALIK PALMER**

and others unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants RAKIEM SAVAGE, HANEEF PALMER, and MALIK PALMER unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, six Continental Refrigerators, belonging to National Refrigeration & A/C and being transported by Catashov Inc., from an employee of Catashov Inc., against his will, by means of actual or threatened force, violence, and fear of injury, immediate and future to his person and property, that is, by grabbing him, carrying him, and forcing him underneath a box truck while unloading the stolen goods.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 1, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
HANEEF PALMER, and  
MALIK PALMER,**

and others unknown to the grand jury, stole, and unlawfully took and carried away with intent to convert to their own use, goods with a value exceeding \$1,000, specifically, six Continental Refrigerators, which were moving as part of and which constituted an interstate shipment of freight or other property, from a trailer, specifically, a Volvo VNL 2020 white truck bearing Pennsylvania temporary license plate 3256177 and vehicle identification number 4V4NC9EH5LN214199, with a trailer bearing Maine license plate 30154746, belonging to Catashov Inc.

In violation of Title 18, United States Code, Section 659.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 13, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
HANEEF PALMER, and  
MALIK PALMER,**

and others unknown to the grand jury, with intent to convert to their own use, stole, and unlawfully took and carried away, and aided and abetted the stealing and unlawful taking and carrying away of, goods with a value exceeding \$1,000, specifically, United States dimes valued at approximately \$234,474.80, which were moving as part of and which constituted an interstate shipment of freight or other property, from a trailer, specifically, a Freightliner white truck bearing Indiana license plate 3282568 with a trailer bearing Maine license plate 3314548, belonging to Keen Cargo.

In violation of Title 18, United States Code, Sections 659 and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 13, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
HANEEF PALMER, and  
MALIK PALMER,**

and others unknown to the grand jury, stole, and knowingly converted to their own use and the use of others, and aided and abetted the stealing and knowing conversion of, money and a thing of value of the United States, specifically, United States dimes under the care of the United States Department of the Treasury, in a value exceeding \$1,000.

In violation of Title 18, United States Code, Sections 641 and 2.



**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about April 13, 2023, through in or around July 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
RONALD BYRD,  
HANEEF PALMER, and  
MALIK PALMER,**

and others unknown to the grand jury, knowing it to have been stolen, received, and retained with intent to convert it to their own use and the use of others, and aided and abetted the receiving and retention of, money and a thing of value of the United States, specifically, United States dimes under the care of the United States Department of the Treasury, in a value exceeding \$1,000.

In violation of Title 18, United States Code, Sections 641 and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about April 13, 2023, through in or about July 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAKIEM SAVAGE,  
RONALD BYRD,  
HANEEF PALMER, and  
MALIK PALMER,**

and others known and unknown to the grand jury, knowing them to have been stolen, received and possessed, and aided and abetted the receiving and possession of, goods with a value exceeding \$1,000, specifically, United States dimes valued at approximately \$234,474.80, which were moving as part of and which constituted an interstate shipment of freight, from a trailer, specifically, a Freightliner white truck bearing Indiana license plate 3282568 with a trailer bearing Maine license plate 3314548, belonging to Keen Cargo.

In violation of Title 18, United States Code, Sections 659 and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 641, as set forth in this indictment, defendants

**RAKIEM SAVAGE,  
RONALD BYRD,  
HANEEF PALMER, and  
MALIK PALMER,**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations, including, but not limited to:

(a) the sum of \$234,474.80 in United States Currency; and

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

**JURY FOREPERSON**

*[Signature]* /for

**JACQUELINE C. ROMERO**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania  
Criminal Division

THE UNITED STATES OF AMERICA

vs.

**RAKIEM SAVAGE**  
**RONALD BYRD**  
**HANEEF PALMER**  
**MALIK PALMER**

INDICTMENT  
Counts

18 U.S.C. § 371 (conspiracy to commit offenses against the United States – 1 count)  
 18 U.S.C. § 1951 (robbery which interferes with interstate commerce – 1 count)  
 18 U.S.C. § 659 (theft from interstate shipment – 2 counts)  
 18 U.S.C. § 641 (theft of government money – 1 count)  
 18 U.S.C. § 659 (possession of items from interstate shipment theft – 1 count)

Foreperson

Bail, §